

# **EXHIBIT J**

## Gabby Hamm

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**From:** Dylan Ciciliano  
**Sent:** Sunday, March 28, 2021 9:28 PM  
**To:** Connell, Monica; Gregory Garman; Gabby Hamm; pneligan@neliganlaw.com; dbuncher@neliganlaw.com; Sarah Rogers; Teresa Pilatowicz; Talitha Gray; William Noall  
**Cc:** Pronske, Gerrit; Van Horn, Eric; Kathman, Jason  
**Subject:** RE: In re NRA Bankruptcy - Excess Benefit Transactions  
**Attachments:** Re: Documents

Hello Monica,

It seems like we may have crossed wires. Please see the attached email sent on Wednesday March 24, 2021. Therein, we identified bates numbers both in the body of the email and in the attached excel spreadsheets. With respect to the spreadsheet over which Mr. Garman had privilege concerns, he permitted questioning at the time of the deposition and expressly stated that he was not sure if the document was privileged. As you note, we have not clawed back the document.

**Dylan T. Ciciliano, Esq.**

Attorney

Phone: [725 777 3000](tel:725.777.3000) | Fax: [725 777 3112](tel:725.777.3112)

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**From:** Connell, Monica <Monica.CConnell@ag.ny.gov>  
**Sent:** Sunday, March 28, 2021 6:05 PM  
**To:** Dylan Ciciliano <dciciliano@Gtg.legal>; Gregory Garman <Ggarman@Gtg.legal>; Gabby Hamm <ghamm@Gtg.legal>; pneligan@neliganlaw.com; dbuncher@neliganlaw.com; Sarah Rogers <sbr@brewerattorneys.com>; Teresa Pilatowicz <tpilatowicz@Gtg.legal>; Talitha Gray <tgray@Gtg.legal>  
**Cc:** Pronske, Gerrit <gpronske@spencerfane.com>; Van Horn, Eric <ericvanhorn@spencerfane.com>; Kathman, Jason <jkathman@spencerfane.com>  
**Subject:** RE: In re NRA Bankruptcy - Excess Benefit Transactions

Dylan:

Thank you for your response. Could you please identify the documents that form the basis of excess benefit transactions reported in the NRA's 2019 990 and taxes reported on the 4720, including those relied upon invoices? Because we have been unable to identify the same despite review of the document production and extensive questioning. Further, you produced an excel spreadsheet that we used to question Mr. LaPierre in part but asserted that the same was privileged, although Debtors have made no move to claw it back. May I assume by your email that you no longer assert privilege in regard to that document? In short, we do need to meet and confer. How about 3:00 EST?

Best,

Monica

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**From:** Dylan Ciciliano <[dciciliano@Gtg.legal](mailto:dciciliano@Gtg.legal)>

**Sent:** Sunday, March 28, 2021 3:47 PM

**To:** Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; Gregory Garman <[Ggarman@Gtg.legal](mailto:Ggarman@Gtg.legal)>; Gabby Hamm <[gamm@gtg.legal](mailto:gamm@gtg.legal)>; [pneligan@neliganlaw.com](mailto:pneligan@neliganlaw.com); [dbuncher@neliganlaw.com](mailto:dbuncher@neliganlaw.com); Sarah Rogers <[sbr@brewerattorneys.com](mailto:sbr@brewerattorneys.com)>; Teresa Pilatowicz <[tpilatowicz@Gtg.legal](mailto:tpilatowicz@Gtg.legal)>; Talitha Gray <[tgray@Gtg.legal](mailto:tgray@Gtg.legal)>

**Cc:** Pronske, Gerrit <[gpronske@spencerfane.com](mailto:gpronske@spencerfane.com)>; Van Horn, Eric <[ericvanhorn@spencerfane.com](mailto:ericvanhorn@spencerfane.com)>; Kathman, Jason <[jkathman@spencerfane.com](mailto:jkathman@spencerfane.com)>

**Subject:** RE: In re NRA Bankruptcy - Excess Benefit Transactions

[EXTERNAL]

Monica,

In light of today's proceedings, I apologize for not meeting your deadline below.

Upon investigation, Debtors have produced the documents that form the basis of excess benefit transactions reported in the NRA's 2019 990 and taxes reported on the 4720, including relied upon invoices. Likewise, I've read transcripts where your co-counsel examined witnesses on those documents, including NRA-BK-00039547. I don't believe there is actually a dispute here. To the extent that you would still like to meet and confer, we'll be available tomorrow. Please propose a time.

**Dylan T. Ciciliano, Esq.**

Attorney

Phone: [725 777 3000](tel:725.777.3000) | Fax: [725 777 3112](tel:725.777.3112)

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**From:** Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>

**Sent:** Saturday, March 27, 2021 2:00 PM

**To:** Dylan Ciciliano <[dciciliano@Gtg.legal](mailto:dciciliano@Gtg.legal)>; Gregory Garman <[Ggarman@Gtg.legal](mailto:Ggarman@Gtg.legal)>; Gabby Hamm <[gamm@Gtg.legal](mailto:gamm@Gtg.legal)>; [pneligan@neliganlaw.com](mailto:pneligan@neliganlaw.com); [dbuncher@neliganlaw.com](mailto:dbuncher@neliganlaw.com)

**Cc:** Pronske, Gerrit <[gpronske@spencerfane.com](mailto:gpronske@spencerfane.com)>; Van Horn, Eric <[ericvanhorn@spencerfane.com](mailto:ericvanhorn@spencerfane.com)>; Kathman, Jason <[jkathman@spencerfane.com](mailto:jkathman@spencerfane.com)>

**Subject:** RE: In re NRA Bankruptcy - Excess Benefit Transactions

Counsel,

I sent this email in Wednesday. Unless I missed it, I have not received a response. Please respond by 11:00 am EST tomorrow.

Monica  
917-855-0782

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**From:** Connell, Monica  
**Sent:** Wednesday, March 24, 2021 9:00 PM  
**To:** Dylan Ciciliano <[dciciliano@Gtg.legal](mailto:dciciliano@Gtg.legal)>; Gregory Garman <[Ggarman@Gtg.legal](mailto:Ggarman@Gtg.legal)>; Gabby Hamm <[gamm@gtg.legal](mailto:gamm@gtg.legal)>; [pneligan@neliganlaw.com](mailto:pneligan@neliganlaw.com); [dbuncher@neliganlaw.com](mailto:dbuncher@neliganlaw.com)  
**Cc:** Pronske, Gerrit <[gpronske@spencerfane.com](mailto:gpronske@spencerfane.com)>; Van Horn, Eric <[ericvanhorn@spencerfane.com](mailto:ericvanhorn@spencerfane.com)>; Kathman, Jason ([jkathman@spencerfane.com](mailto:jkathman@spencerfane.com)) <[jkathman@spencerfane.com](mailto:jkathman@spencerfane.com)>  
**Subject:** In re NRA Bankruptcy - Excess Benefit Transactions

Counsel,

We have been endeavoring, through demands and various witnesses, to obtain information regarding the amount of excess benefit transactions reported in the NRA's 2019 990 and taxes reported on the 4720s including specifically the documents that were relied upon to make those calculations and the manner of calculation. We have been met with assertions of privilege. This is unacceptable and we would like to meet and confer with regard to this issue as soon as possible. Please let me know when you are free.

Monica

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